

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES,

HON. DENISE PAGE HOOD

Case No. 20-20345

Plaintiff,

Vs.

GINO MORGAN,

Defendant.

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**MOTION TO MODIFY BOND CONDITION**

Now Comes the Defendant, Gino Morgan, by and through his attorney, Steven Scharg, and respectfully requests that this Honorable Court to modify his bond condition, specifically, removing the GPS tether condition for the following reasons:

1. Defendant was charged in a one count Indictment charging Felon in Possession of a Firearm pursuant to 18 U.S.C. Section 922(g)(1).
2. That on September 16, 2020, this Honorable Court granted Defendant a bond with a special condition of being on Home Detention and GPS monitoring.
3. That Defendant has not violated any terms of his bond conditions and has also complied with his GPS monitoring with no violations since it was installed

over six months ago.

4. That Defendant wants to improve his capabilities in making a better living for his family but it is extremely difficult while wearing his GPS tether.
5. That Pretrial Officer, David Nickoloff had no objection and is in favor of Defendant's GPS tether being removed.
6. The Assistant U.S. Attorney, Craig Winniger, objects to our request.

WHEREFORE, Defendant, Gino Morgan, respectfully is requesting that his bond condition be modified so his GPS tether can be removed.

Respectfully submitted,

/s/ Steven Scharg  
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Dated: April 19, 2021

CERTIFICATE OF SERVICE

I hereby certify that I served, Assistant United States Attorney, Craig Winniger with a copy of this motion by ECF filing at [Craig.winniger@usdoj.gov](mailto:Craig.winniger@usdoj.gov).

Respectfully submitted,

/s/ Steven Scharg  
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Dated: April 19, 2021